PATENT Atty. Dkt. No. ROC920010279US1 MPS Ref. No.: IBMK10279

## REMARKS

This is intended as a full and complete response to the Final Office Action dated January 4, 2005, having a shortened statutory period for response set to expire on April 4, 2005. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-34 are pending in the application. Claims 1-34 remain pending following entry of this response. Claims 1 and 12 have been amended. Applicants submit that the amendments do not introduce new matter or new issues.

## Claim Rejections - 35 U.S.C. § 102

Claims 1-34 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Wong et al. (U.S. Patent No. 6,654,746, hereinafter "Wong"). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, Wong does not disclose "each and every element as set forth in the claim". Specifically, Wong does not disclose that the step of "modifying at least an item of data stored in the second database based on the contents of the first electronic document" is part of a computer-implemented method that is automatically executed, as recited in the claims. The Examiner states that Wong discloses that the "user updates the updated file on the client computer." However, one specific purpose recited in the background of the invention is to remove the manual updates that are likely to cause errors and delays. (Specification, paragraph [0006]). Also, the claims clearly recites that the method is performed as a computer-implemented method in which the method

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is automatically executed in response to a predetermined event. Thus, such features are not disclosed by *Wong*.

Furthermore, Wong does not disclose a first system and a second system having a first database and a second data base, respectively. Furthermore, Wong does not disclose that at least one of the systems is configured to prevent the other of the two systems from directly accessing its respective database. The Examiner argues that Wong discloses a first database in col. 8, lines 12-37, in reference to a "subscription database" and a second database in the client computer 201 in Figure 2 in what the Examiner referred to as the "database on client computer". However, the cited passages and figures are in fact directed to a networked system having a network drive 202 connected and accessible by both the client computer 201 and the server computer 203 (shown in Figure 2 of Wong), wherein a plurality of file servers (e.g., Ref. # 302-309) are connected and accessible via a LAN 316 and/or a WAN 317 by both the server computer 301 the client computer (e.g., Ref. # 310-315) (shown in Figure 3 of Wong). Furthermore, Wong specifically teaches that the "client runs in on-line mode when it is on the network where it can communicate directly with the server's database." (Wong, col. 8, lines 14-16). Thus, the databases disclosed in Wong are not "prevented" from access by either the client computer or the server computer.

Therefore, Applicants submit that claims 1-34 are patentable over *Wong*. Withdrawal of the rejection is respectfully requested.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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